



131 SOUTH ROBERTSON STREET (70112)
P.O. BOX 61780
NEW ORLEANS, LA 70161-1780
(504) 561-2811
FAX (504) 561-2837

March 11, 2005

RULES PROCESSING TEAM

Department of the Interior
Minerals Management Service
Attention: Rules Processing Team (RPT)
381 Elden Street
Herndon, Virginia 20170-4817

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Attention: Rules Processing Team

**Re: Oil and Gas and Sulphur Operations on the Outer Continental Shelf (OCS)
Suspension of Operations (SOO's) for Ultra-Deep Drilling. 70 Federal Register
7451-7455 February 14, 2005)**

Murphy Exploration & Production Company - USA (Murphy) owns and operates oil and gas leases in federal waters of the Gulf of Mexico, and has a direct interest in this matter. Murphy supports the proposed rule.

The above-referenced proposed rule would allow MMS to grant Suspensions of Operations (SOO's) to oil and gas lessees or operators who plan to drill ultra-deep wells of at least 25,000 feet (total vertical depth subsurface) on leases with either a 5-year primary term or an 8-year primary term with a requirement to drill within the first 5 years. In order to obtain an SOO, lessees, or operators, would have to meet specific requirements regarding the acquisition and interpretation of geophysical data and in order to demonstrate the need for additional time.

The MMS states that it has proposed this revision to current regulations because of the added complexity and costs associated with planning and drilling ultra-deep wells. The ability to apply for one of these newly defined SOO's will be beneficial to smaller companies. By publishing this final rule the MMS is fulfilling one of its OCS Lands Act objectives of promoting competition.

We agree with the MMS that the new rule is likely to lead to increased drilling of ultra-deep wells and increased domestic production. This will increase revenues to the Treasury, increase domestic energy production and benefit the economy.

Murphy agrees with the comment filed jointly by several oil and gas trade associations in pointing out that both the technical complexities, infrastructure development and significant capital investment required to explore and produce in the most promising ultra-deep exploration areas in the Gulf of Mexico can require more time than is available under the traditional primary lease terms.

A handwritten signature in black ink that reads "Charles A. Bedell". The signature is written in a cursive, flowing style.

Charles A. Bedell, Manager
Environment & Government Affairs